

[Home](#) > [Search](#) > [Case Search](#)

Case Details - GD-20-010995

Lewis vs Google Inc. etal

Filing Date:

10/21/2020

Filing Time:

04:16:13

Related Cases:

Consolidated Cases:

Judge:

No Judge

Amount In Dispute:

\$ 0

Case Type:

Other Tort

Court Type:

General Docket

Current Status:

Praeipce for Appearance

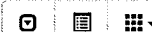
Jury Requested:

Y

- Parties Count : 5

--Litigants--

Search



LName	FName	MI	Type	Address	Initial Service Completion	Attorney
Lewis	Kerry		Plaintiff	1040 Fifth Avenue 1st Floor Pittsburgh PA 15219	--	J. Kerrington Lewis
Google Inc.			Defendant	6425 Penn Avenue Pittsburgh PA 15206	--	Ryan James
Alphabet Inc.			Defendant	1600 Amphitheatre Parkway Mountain View CA 94043	--	Ryan James

Showing 1 to 3 of 3 rows

--Attorney--

Search



LName	FName	MI	Type	Address	Phone
Lewis	J.	Kerrington	Plaintiff's Attorney	1040 Fifth Ave Suite 100 Pittsburgh PA 15219	4123910818
James	Ryan		Attorney		--

Showing 1 to 2 of 2 rows

--Non Litigants--

Search



No matching records found

Top

- Docket Entries Count : 2

Search



Filing Date	Docket Type	Docket Text	Filing Party	Original Document	Redacted Document
11/16/2020	Praeipce for Appearance	Filed on Behalf of Defendants	Ryan James	Document 2	Document 2
10/21/2020	Complaint		Kerry Lewis	Document 1	Document 1

Showing 1 to 2 of 2 rows

Event Schedule Count : 0

Search



No matching records found

Services Count : 0Complete Service History

Search



No matching records found

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS, an adult
individual,

Plaintiff,

vs.

GOOGLE, INC., a corporation, and
ALPHABET, INC., a corporation,

Defendants.

CIVIL DIVISION

NO.: G.D. 20-

COMPLAINT IN CIVIL ACTION

Filed on behalf of:

PLAINTIFF, KERRY LEWIS
PRO SE

LEWIS, LEWIS & REILLY
1040 Fifth Avenue, 1st Floor
Pittsburgh, PA 15219-6268

Phone: (412) 391-0818
Facsimile: (412) 391-8144

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult)	
individual,)	
)	
Plaintiff,)	
)	
vs.)	NO.: G.D. 20-
)	
GOOGLE, INC., a corporation, and)	
ALPHABET, INC., a corporation,)	
)	
Defendants.)	Jury Trial Demanded

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by an attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**LAWYER REFERRAL SERVICE
ALLEGHENY COUNTY BAR ASSOCIATION
400 KOPPERS BUILDING
436 7TH AVENUE, 3RD FLOOR
PITTSBURGH, PA 15219**

TELEPHONE NO.: (412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult)	
individual,)	
)	
Plaintiff,)	
)	
vs.)	NO.: G.D. 20-
)	
GOOGLE, INC., a corporation, and)	
ALPHABET, INC., a corporation,)	
)	
Defendants.)	

COMPLAINT IN CIVIL ACTION

AND NOW, comes the Plaintiff, Kerry Lewis, Pro Se, and files the within Complaint in Civil Action, and in support thereof, avers as follows:

1. Plaintiff is Kerry Lewis, an adult individual, with professional offices located at 1040 Fifth Avenue, 1st Floor, Pittsburgh, Allegheny County, Pennsylvania 15219.
2. The Defendant Google, Inc. is a corporation with professional offices located at 6425 Penn Avenue, Pittsburgh, Allegheny County, Pennsylvania 15206, hereinafter referred to as "Google."
3. The Defendant Alphabet, Inc. is a corporation which is a holding company for various corporations including Google, with professional offices located at 1600 Amphitheatre Parkway, Mountain View, California 94043.
4. Plaintiff is a lawyer and a member of the Pennsylvania law firm of Lewis, Lewis & Reilly which maintains a website known as "LewisLewisReilly.com."
5. Plaintiff also maintains a website known as KerryLewisLaw.com.

6. At all times material to this Complaint, the Defendants jointly operated an Internet search engine which it markets as “Google” and provides search capabilities for Internet users.
7. Defendants jointly operate a regular and systematic search engine that provides Internet users access to millions of business web sites including but not limited to multi-national corporations, small business, individual merchants, and professional service providers and publishes and disseminates reviews regarding these businesses.
8. The reviews are usually short, written statements, authored by individuals, which describes their respective interaction with a particular business or service provider. The reviews can be positive, neutral, or negative depending upon the individual’s opinion regarding their experience. These reviews are posted by the individual on Google’s platform and Google incorporates the review so that it appears on the search results of that particular business to which it relates.
9. Defendant Google has published a “review” by a “Lolo Mosby” in which she reports a horrible experience interacting with Plaintiff in his professional capacity. Her review describes Plaintiff as “failing to show up for a hearing” and claims Plaintiff “ruined her life.” (See Exhibit “A” attached.)
10. Plaintiff has advised Defendants that the review is a fraud, that Plaintiff has never had a client named “Lolo Mosby,” there is no court record or other document which would support Ms. Mosby’s claim that Plaintiff represented her, and despite Plaintiff’s request to Defendants to investigate this fraud, Defendants have refused to take any action and continue to maintain and disseminate the fake review in connection with Internet searches of the Plaintiff conducted on its platform.

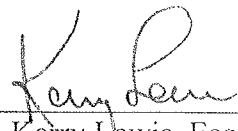
11. Defendants have refused to remove the review notwithstanding Plaintiff has advised and requested Defendants to do so numerous times over the past year.
12. Defendants' conduct is willful, wanton, and wrongful in that it has systematically refused to respond to the Plaintiff's requests, objections, and pleas regarding the verifiable means at Defendants' disposal to confirm that both "Lolo Mosby" and the review that she posted are a fraud. Further, there are no documents, court records or other documents which in any way suggest the Plaintiff has ever represented the person identified as "Lolo Mosby," the alleged author of the bogus review.
13. The Defendants' failure to conduct an investigation and remove the fraudulent review has caused damage to Plaintiff's professional reputation and resulted in great injury to Plaintiff's good name, credit and reputation, all of which has been to his great financial loss and damage.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally, in an amount in excess of the Arbitration limits of the Court of Common Pleas of Allegheny County, Pennsylvania.

JURY TRIAL DEMANDED.

Respectfully submitted,

LEWIS, LEWIS & REILLY

By: 
Kerry Lewis, Esquire
Plaintiff, Pro Se

Kerry Lewis Law

1040 Fifth Ave #1, Pittsburgh, PA

[Write a review](#)

4.2

1 2 3 4 5 6 7 8 9 10

[Next](#)

5 reviews

Sort by: Most relevant ▼

15219, Pittsburgh, PA - From your Internet address - Use precise location - [Learn more](#)

[Help](#)

[Send feedback](#)

[Privacy](#)

[Terms](#)



Lolo Mosby

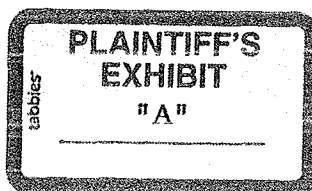
Local Guide · 197 reviews · 295 photos

6 months ago

I wish I could rate a zero he lied to me said he would work my case probono but when I had my hearing and really needed him most he failed me never attended court with me never helped me at all just gave me tons of broken promises.... Totally felt alone and neglected following this... Thanks for nothing and thanks for ruining my life Kerry Lewis... Smh



1



VERIFICATION

I verify that the statements and averments made in the foregoing **Complaint in Civil Action** are true and correct. I understand that false statements herein are made subject to the penalties of 18 PA C.S. §4904 relating to unsworn falsification to authorities.

x 
Kerry Lewis

Dated: 10/21/2020

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS,

Plaintiff,

v.

GOOGLE, INC.; and ALPHABET, INC.,

Defendants.

CIVIL DIVISION

No. GD 20-010995

**PRAECIPE FOR ENTRY OF
APPEARANCE**

Filed on Behalf of Defendants

Counsel of Record for These Parties:

Ryan James
Pa I.D. #82799

J. Andrew Salemme
Pa. I.D. #298257

TUCKER ARENSBERG, P.C.
1500 One PPG Place
Pittsburgh, PA 15222
(412) 566-1212
rjames@tuckerlaw.com
asalemme@tuckerlaw.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS,

CIVIL DIVISION

Plaintiff,

No. GD 20-010995

v.

GOOGLE, INC.; ALPHABET, INC.

Defendants.

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE DEPARTMENT OF COURT RECORDS:

Kindly enter the appearance of Ryan James, J. Andrew Salemme, and the law firm of Tucker Arensberg, P.C., on behalf of the Defendants in the above-referenced action.

TUCKER ARENSBERG, P.C.

/s/ Ryan James

Ryan James

Pa. I.D. #82799

J. Andrew Salemme

Pa. I.D. #298257

1500 One PPG Place

Pittsburgh, PA 15222

(412) 566-1212

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Tucker Arensberg, P.C.

Signature: /s/ Ryan James

Name: Ryan James

Attorney No.: #82799

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Praecipe for Entry of Appearance was served upon the following party by United States mail, first class, postage prepaid, this 16th day of November, 2020:

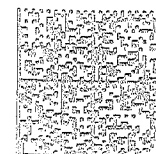
Kerry Lewis, Esquire
Lewis, Lewis & Reilly
1040 Fifth Avenue, 1st Floor
Pittsburgh, PA 15219

/s/ Ryan James

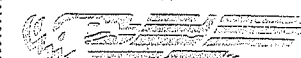
Ryan James

FORM 2 SHERIFF
IF NOT CALLED FOR IN 10 DAYS RETURN TO
WILLIAM P MULLEN SHERIFF
ROOM 111 COURTHOUSE
436 GRANT STREET
PITTSBURGH PA 15219-2496

CERTIFIED MAIL



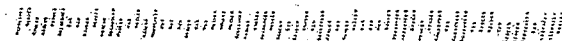
U.S. POSTAGE PITNEY BOWES



ZIP 15219 \$005.71⁰
02 40
0000348379 OCT. 27. 2020

Alphabet Inc.
1600 Amphitheatre Dr.
Mountainview, CA 94043

9404381351 C909



NOTICE OF SUIT TO SHERIFF OF ALLEGHENY CO.

You are hereby notified that on 10/21/2020

a COMPLAINT has been filed in this case

and you are required to serve the same on or before the

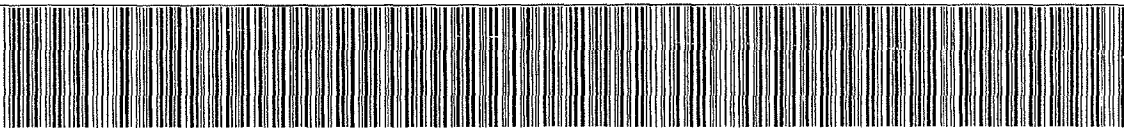
11/20/2020

Michael McGeever, Director

Department of Court Records

COMPLAINT IN CIVIL ACTION**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA**

Plaintiff(s) Lewis, Kerry	Case Number: GD-20-010995 Type of pleading: Complaint Filed on behalf of: Lewis Kerry <u>Lewis Kerrington J.</u> (Name of filing party)
Defendant(s) Google Inc., Alphabet Inc.,	VS <input checked="checked" type="checkbox"/> Counsel of Record <input type="checkbox"/> Individual, If Pro Se Name, Address and Telephone Number: Lewis Kerrington J. 1040 Fifth Ave Suite 100 Pittsburgh, PA, 15219 412 3910818 Attorney's State ID: 15575



Michael McGeever, Director, Department of Court Records

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS, an adult
individual,

Plaintiff,

vs.

GOOGLE, INC., a corporation, and
ALPHABET, INC., a corporation,

Defendants.

CIVIL DIVISION

NO.: G.D. 20- 010995

COMPLAINT IN CIVIL ACTION

Filed on behalf of:

PLAINTIFF, KERRY LEWIS
PRO SE

LEWIS, LEWIS & REILLY
1040 Fifth Avenue, 1st Floor
Pittsburgh, PA 15219-6268

Phone: (412) 391-0818
Facsimile: (412) 391-8144

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult)	
individual,)	
)	
Plaintiff,)	
)	
vs.)	NO.: G.D. 20-010995
)	
GOOGLE, INC., a corporation, and)	
ALPHABET, INC., a corporation,)	
)	
Defendants.)	Jury Trial Demanded

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by an attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**LAWYER REFERRAL SERVICE
ALLEGHENY COUNTY BAR ASSOCIATION
400 KOPPERS BUILDING
436 7TH AVENUE, 3RD FLOOR
PITTSBURGH, PA 15219**

TELEPHONE NO.: (412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult
individual,

Plaintiff,

vs.

GOOGLE, INC., a corporation, and
ALPHABET, INC., a corporation,

Defendants.

)
)
)
)
)
)
)
)
)
)
)

NO.: G.D. 20- 010995

COMPLAINT IN CIVIL ACTION

AND NOW, comes the Plaintiff, Kerry Lewis, Pro Se, and files the within Complaint in Civil Action, and in support thereof, avers as follows:

1. Plaintiff is Kerry Lewis, an adult individual, with professional offices located at 1040 Fifth Avenue, 1st Floor, Pittsburgh, Allegheny County, Pennsylvania 15219.
2. The Defendant Google, Inc. is a corporation with professional offices located at 6425 Penn Avenue, Pittsburgh, Allegheny County, Pennsylvania 15206, hereinafter referred to as "Google."
3. The Defendant Alphabet, Inc. is a corporation which is a holding company for various corporations including Google, with professional offices located at 1600 Amphitheatre Parkway, Mountain View, California 94043.
4. Plaintiff is a lawyer and a member of the Pennsylvania law firm of Lewis, Lewis & Reilly which maintains a website known as "LewisLewisReilly.com."
5. Plaintiff also maintains a website known as KerryLewisLaw.com.

6. At all times material to this Complaint, the Defendants jointly operated an Internet search engine which it markets as “Google” and provides search capabilities for Internet users.
7. Defendants jointly operate a regular and systematic search engine that provides Internet users access to millions of business web sites including but not limited to multi-national corporations, small business, individual merchants, and professional service providers and publishes and disseminates reviews regarding these businesses.
8. The reviews are usually short, written statements, authored by individuals, which describes their respective interaction with a particular business or service provider. The reviews can be positive, neutral, or negative depending upon the individual’s opinion regarding their experience. These reviews are posted by the individual on Google’s platform and Google incorporates the review so that it appears on the search results of that particular business to which it relates.
9. Defendant Google has published a “review” by a “Lolo Mosby” in which she reports a horrible experience interacting with Plaintiff in his professional capacity. Her review describes Plaintiff as “failing to show up for a hearing” and claims Plaintiff “ruined her life.” (See Exhibit “A” attached.)
10. Plaintiff has advised Defendants that the review is a fraud, that Plaintiff has never had a client named “Lolo Mosby,” there is no court record or other document which would support Ms. Mosby’s claim that Plaintiff represented her, and despite Plaintiff’s request to Defendants to investigate this fraud, Defendants have refused to take any action and continue to maintain and disseminate the fake review in connection with Internet searches of the Plaintiff conducted on its platform.

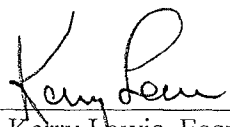
11. Defendants have refused to remove the review notwithstanding Plaintiff has advised and requested Defendants to do so numerous times over the past year.
12. Defendants' conduct is willful, wanton, and wrongful in that it has systematically refused to respond to the Plaintiff's requests, objections, and pleas regarding the verifiable means at Defendants' disposal to confirm that both "Lolo Mosby" and the review that she posted are a fraud. Further, there are no documents, court records or other documents which in any way suggest the Plaintiff has ever represented the person identified as "Lolo Mosby," the alleged author of the bogus review.
13. The Defendants' failure to conduct an investigation and remove the fraudulent review has caused damage to Plaintiff's professional reputation and resulted in great injury to Plaintiff's good name, credit and reputation, all of which has been to his great financial loss and damage.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally, in an amount in excess of the Arbitration limits of the Court of Common Pleas of Allegheny County, Pennsylvania.

JURY TRIAL DEMANDED.

Respectfully submitted,

LEWIS, LEWIS & REILLY

By: 
Kerry Lewis, Esquire
Plaintiff, Pro Se

Kerry Lewis Law

1040 Fifth Ave #1, Pittsburgh, PA

[Write a review](#)

4.2

1 2 3 4 5 6 7 8 9 10

[Next](#)

5 reviews

Sort by: Most relevant ▾

15219, Pittsburgh, PA - [From your Internet address](#) - [Use precise location](#) - [Learn more](#)

[Help](#) [Send feedback](#) [Privacy](#) [Terms](#)



Lolo Mosby

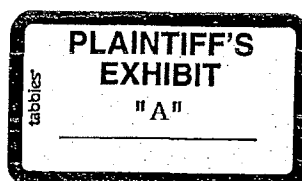
Local Guide · 197 reviews · 295 photos

6 months ago

I wish I could rate a zero he lied to me said he would work my case probono but when I had my hearing and really needed him most he failed me never attended court with me never helped me at all just gave me tons of broken promises.... Totally felt alone and neglected following this... Thanks for nothing and thanks for ruining my life Kerry Lewis... Smh

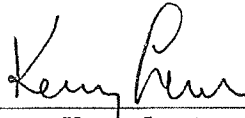


1



VERIFICATION

I verify that the statements and averments made in the foregoing **Complaint in Civil Action** are true and correct. I understand that false statements herein are made subject to the penalties of 18 PA C.S. §4904 relating to unsworn falsification to authorities.

x 
Kerry Lewis

Dated: 10/21/2020

10/30/20

Form 2 sheriff
US Postal Service
9171999991703587140724

Envelope

Legal
Google



legal—deliveries

DIGITAL MAIL

Digital Mail



US—MTV—2690



13972330

DO NOT REMOVE OR DESTROY THIS LABEL
IT IS THE PROPERTY OF THE U.S. POSTAL SERVICE
AND WILL BE REUSED FOR TRACKING PURPOSES